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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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LUDOVIC MICHAUD, *et al.*,  
Plaintiffs,

v.

UNITED STATES OF AMERICA,  
Defendant.

**UNITED STATES' DESIGNATION  
OF EXPERT WITNESSES**

Case No. 2:21-cv-00722-BSJ

Judge Bruce S. Jenkins

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Based on the information currently available, the United States identifies the following as expert witnesses that the United States may call to testify at trial:

**RETAINED EXPERT WITNESSES**

1. Laura Malowane, PhD  
Secretariat Economists  
2121 K Street NW  
Suite 1100  
Washington, DC 20037

Dr. Malowane is a retained economist. She may be called to rebut the testimony of Plaintiffs' retained economist and to testify as to the calculation of economic damages.

2. Merrill A. Cohen, MC, CDMS, CRC, CCM, CLCP  
Strategic Consulting Services  
15 S. Grady Way, Suite 115  
Renton, Washington 98057

Ms. Cohen is a retained vocational expert. She may be called to rebut the testimony of Plaintiffs' retained vocational expert and to testify as to the potential earning capacity of the decedent.

3. Mark H. Warner  
Collision Safety Engineering  
416 South Commerce Drive  
Orem, Utah 84058

Mr. Warner is a retained expert in the area of accident reconstruction and may be called to rebut the testimony of Plaintiffs' accident reconstructionist.

#### **NON-RETAINED EXPERT WITNESSES**

The United States cross-designates Karen DeKruger and Emmanuelle Vaux-Lacrois as non-retained experts and incorporates Plaintiffs' disclosures as to each herein. Docket No. 54.

Respectfully submitted this 14th day of April, 2022.

ANDREA T. MARTINEZ  
United States Attorney

/s/ Amanda A. Berndt  
AMANDA A. BERNDT  
Assistant United States Attorney